REMARKS

This Amendment is in response to the Office Action dated November 24, 2004. In the Office Action, claims 1-22 were rejected under 35 USC §102. By this Amendment, claims 5, 7, 18 and 21 are amended. Currently pending claims 1-22 are believed allowable, with claims 1, 7, 11, 14, 18 and 21 being independent claims.

SPECIFICATION OBJECTIONS:

The Specification was objected to for allegedly containing embedded hyperlinks and/or other form of browser-executable code. Office Action, item 6. The Office Action requests deletion of these

Examiners are required to review patent applications to ensure that hyperlinks and other forms of browser-executable code, especially commercial site URLs, are not included in a patent application. MPEP 608.01. Examples of a hyperlink or a browser-executable code are a URL placed between these symbols "< >" and http:// followed by a URL address. *Id.* It is respectfully noted that inclusion of URLs is not prohibited by the USPTO, as long the URLs are not hyperlinks or in the form of browser-executable code.

Although the Specification includes URLs directing the reader to information that may be useful in reviewing the present application, these URLs are not placed between "< >" symbols or are in any other browser-executable form. Thus, the Applicant respectfully submits that the Specification does not contain an embedded hyperlink and/or other form of browser-executable code.

CLAIM OBJECTIONS:

Claim 5 was objected as being indefinite for lack of antecedent basis in the phrase "said at least one parameter." Office Action, item 8. By this Amendment, claim 5 is modified to be dependent on claim 4, which provides antecedent basis for this limitation. Amendment of claim 5 is not made to overcome the cited documents or for reasons of patentability.

CLAIM REJECTIONS UNDER 35 USC §102:

Claims 1-22 were rejected under 35 USC §102 as being anticipated by U.S. Patent Application Publication US2002/0007317A1 to Callaghan et al.

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("Callaghan"). To anticipate a claim under 35 USC §102, a reference must teach every element of the claim. MPEP 2131.

Before addressing the specific claim rejections, some general comments about the present Application and the Cannon reference are made. The present invention relates to tracking information across different domains. Application, page 4, lines 10-17. In one embodiment of the invention, each domain is free to utilize its own user-tracking mechanism (such as a cookie or URL tag). Application, page 10, lines 16-19. Each user-tracking mechanism is correlated through a coordination database and client redirection. Application, page 11, lines 3-14.

More specifically, a client visiting a first website is tracked using the first site's tracking mechanism of choice and stores a client record in the coordination database. Application, page 13, lines 6-8. The client is then provided with a link to a second website, where the link encapsulates information about the location of the client record in the coordination database. Application, page 13, lines 8-12. When the client navigates to the second website, the second website decapsulates the information from the link. Application, page 13, lines 22-24. The second website can use this information to access the coordination database and correlate its own tracking mechanism with the tracking mechanism of the first website. Application, page 13, line 24 – page 14, lines 6.

Callaghan deals with techniques for sharing state information across different domains. Callaghan, paragraph 1. In one embodiment of Callaghan, state information associated with one or more domains is stored in a cookie, and that cookie is then forwarded to one or more other domains. Callaghan, paragraph 43. This is achieved by utilizing an intermediary application (such as a proxy server) that intercepts communications between a client and server, and adds state information to the communications. Callaghan, paragraph 56.

<u>Claim 1:</u>

Claim 1 recites, in part, "wherein the first web server uses a first user tracking mechanism to collect client information and stores the client information as a client record in a database." Application, claim 1, lines 3-5.

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As discussed above, Callaghan uses an intermediary application (such as a proxy server) that intercepts communications between a client and server, and adds state information to the communications. Callaghan, paragraph 56. Callaghan does not require nor discusses a database for storing client records. Indeed, Callaghan only mentions the word "database" once in its specification, and in the context of using a database to store URLs that require authorization. Callaghan, paragraph 91. It is therefore respectfully submitted that Callaghan does not teach or suggest a first web server that that uses a first user tracking mechanism to collect client information and store client information as a client record in a database.

Claim 1 also recites, in part, "said resource encapsulating information about a location of the client record in the database." Application, claim 1, lines 8-9. As discussed above, the teachings of Callaghan do not mention or suggest using a database to store client records. Therefore, it is respectfully submitted that Callaghan does not contain teachings relating to resource encapsulating information about a location of the client record in the database.

Claim 1 further recites, in part, "the second web server decapsulating the location and retrieving the client record from the database." Application, claim 1, lines 10-11. As discussed above, the teachings of Callaghan do not mention or suggest using a database to store client records. Therefore, it is respectfully submitted that Callaghan does not contain teachings relating to a second web server deapsulating a location and retrieving a client record from a database.

For at least these reasons, claim 1 is not believed to be anticipated by Callaghan. Moreover, it is respectfully submitted that claim 1 is allowable and indication of such allowance is earnestly requested.

<u>Claims 2-6, 12 and 15:</u>

Claims 2-6, 12 and 15 are dependent on and further limit claim 1. Since claim 1 is believed allowable, claims 2-6, 12 and 15 are also believed allowable for at least the same reasons as claim 1.

Claim 7:

Claim 7 recites, in part, "storing a client record in a database by the first web server." Application, claim 7, line 7. Support for this claim element can be found at least on page 13, lines 6-8 of the Application.

As discussed above, Callaghan uses an intermediary application (such as a proxy server) that intercepts communications between a client and server, and adds state information to the communications. Callaghan, paragraph 56. Callaghan does not require nor discusses a database for storing client records. Indeed, Callaghan only mentions the word "database" once in its specification, and in the context of using a database to store URLs that require authorization. Callaghan, paragraph 91. It is therefore respectfully submitted that Callaghan does not teach or suggest storing a client record in a database by the first web server.

Claim 7 also recites, in part, "creating a link to the second web server that encapsulates information about a location of the client record in the database." Application, claim 7, lines 8-9. Support for this claim element can be found at least on page 13, lines 8-12 of the Application. As discussed above, the teachings of Callaghan do not mention or suggest using a database to store client records. Therefore, it is respectfully submitted that Callaghan does not contain teachings relating to creating a link to the second web server that encapsulates information about the location of the client record in the database.

For at least these reasons, claim 7 is not believed to be anticipated by Callaghan. Moreover, it is respectfully submitted that claim 7 is allowable and indication of such allowance is earnestly requested.

Claims 8-10, 13 and 16:

Claims 8-10, 13 and 16 are dependent on and further limit claim 7. Since claim 7 is believed allowable, claims 8-10, 13 and 16 are also believed allowable for at least the same reasons as claim 7.

Claim 11:

Claim 11 recites, in part, "wherein the first web server uses a first user tracking mechanism to collect client information and stores the client

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information as a client record in a database." Application, claim 11, lines 3-5.

As discussed above, Callaghan uses an intermediary application (such as a proxy server) that intercepts communications between a client and server, and adds state information to the communications. Callaghan, paragraph 56. Callaghan does not require nor discusses a database for storing client records. Indeed, Callaghan only mentions the word "database" once in its specification, and in the context of using a database to store URLs that require authorization. Callaghan, paragraph 91. It is therefore respectfully submitted that Callaghan does not teach or suggest a first web server that that uses a first user tracking mechanism to collect client information and store client information as a client record in a database.

Claim 11 also recites, in part, "said resource encapsulating information about a location of the client record in the database." Application, claim 11, lines 8-9. As discussed above, the teachings of Callaghan do not mention or suggest using a database to store client records. Therefore, it is respectfully submitted that Callaghan does not contain teachings relating to resource encapsulating information about a location of the client record in the database.

Claim 11 further recites, in part, "the second web server decapsulating the location and retrieving the client record from the database." Application, claim 11, lines 10-11. As discussed above, the teachings of Callaghan do not mention or suggest using a database to store client records. Therefore, it is respectfully submitted that Callaghan does not contain teachings relating to a second web server deapsulating a location and retrieving a client record from a database.

For at least these reasons, claim 11 is not believed to be anticipated by Callaghan. Moreover, it is respectfully submitted that claim 11 is allowable and indication of such allowance is earnestly requested.

Claim 17:

Claim 17 is dependent on and further limits claim 11. Since claim 11 is believed allowable, claim 17 is also believed allowable for at least the same reasons as claim 11.

Claim 14:

Claim 14 recites, in part, "wherein the first user tracker uses a first user tracking mechanism to collect client information and stores the client information as a client record in a database." Application, claim 14, lines 3-5.

As discussed above, Callaghan uses an intermediary application (such as a proxy server) that intercepts communications between a client and server, and adds state information to the communications. Callaghan, paragraph 56. Callaghan does not require nor discusses a database for storing client records. Indeed, Callaghan only mentions the word "database" once in its specification, and in the context of using a database to store URLs that require authorization. Callaghan, paragraph 91. It is therefore respectfully submitted that Callaghan does not teach or suggest a first web server that that uses a first user tracking mechanism to collect client information and store client information as a client record in a database.

Claim 14 also recites, in part, "said resource encapsulating information about a location of the client record in the database." Application, claim 14, lines 8-9. As discussed above, the teachings of Callaghan do not mention or suggest using a database to store client records. Therefore, it is respectfully submitted that Callaghan does not contain teachings relating to resource encapsulating information about a location of the client record in the database.

Claim 14 further recites, in part, "the second user tracker decapsulating the location and retrieving the client record from the database." Application, claim 14, lines 10-11. As discussed above, the teachings of Callaghan do not mention or suggest using a database to store client records. Therefore, it is respectfully submitted that Callaghan does not contain teachings relating to a second user tracker decapsulating a location and retrieving a client record from a database.

For at least these reasons, claim 14 is not believed to be anticipated by Callaghan. Moreover, it is respectfully submitted that claim 14 is allowable and indication of such allowance is earnestly requested.

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Claim 18:

Claim 18 recites, in part, "storing a client record in a database by the first web server." Application, claim 18, line 7. Support for this claim element can be found at least on page 13, lines 6-8 of the Application.

As discussed above, Callaghan uses an intermediary application (such as a proxy server) that intercepts communications between a client and server, and adds state information to the communications. Callaghan, paragraph 56. Callaghan does not require nor discusses a database for storing client records. Indeed, Callaghan only mentions the word "database" once in its specification, and in the context of using a database to store URLs that require authorization. Callaghan, paragraph 91. It is therefore respectfully submitted that Callaghan does not teach or suggest storing a client record in a database by the first web server.

Claim 18 also recites, in part, "creating a link to the second web server that encapsulates information about a location of the client record in the database." Application, claim 18, lines 8-9. Support for this claim element can be found at least on page 13, lines 8-12 of the Application. As discussed above, the teachings of Callaghan do not mention or suggest using a database to store client records. Therefore, it is respectfully submitted that Callaghan does not contain teachings relating to creating a link to the second web server that encapsulates information about the location of the client record in the database.

For at least these reasons, claim 18 is not believed to be anticipated by Callaghan. Moreover, it is respectfully submitted that claim 18 is allowable and indication of such allowance is earnestly requested.

Claims 19 and 20:

Claims 19 and 20 are dependent on and further limit claim 18. Since claim 18 is believed allowable, claims 19 and 20 are also believed allowable for at least the same reasons as claim 18.

Claim 21:

Claim 21 recites, in part, "a first user tracker to collect client information and store client information as a client record in a cookie coordinator database." Application, claim 21, lines 5-6.

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As discussed above, Callaghan uses an intermediary application (such as a proxy server) that intercepts communications between a client and server, and adds state information to the communications. Callaghan, paragraph 56. Callaghan does not require nor discusses a database for storing client information. Indeed, Callaghan only mentions the word "database" once in its specification, and in the context of using a database to store URLs that require authorization. Callaghan, paragraph 91. It is therefore respectfully submitted that Callaghan does not teach or suggest a first user tracker to collect client information and store client information as a client record in a cookie coordinator database.

Claim 21 also recites, in part, "an encapsulator for said resource to encapsulate information about a location of the client record in the database." Application, claim 21, lines 9-10. As discussed above, the teachings of Callaghan do not mention or suggest using a database to store client records. Therefore, it is respectfully submitted that Callaghan does not contain teachings relating to an encapsulator for a resource to encapsulate information about a location of a client record in a database.

Claim 21 further recites, in part, "a decapsulator for the second web server to decapsulate a location and retrieve the client record from the database." Application, claim 21, lines 14-15. As discussed above, the teachings of Callaghan do not mention or suggest using a database to store client records. Therefore, it is respectfully submitted that Callaghan does not contain teachings relating to a decapsulator for a second web server to decapsulate a location and retrieve the client record from the database.

For at least these reasons, claim 21 is not believed to be anticipated by Callaghan. Moreover, it is respectfully submitted that claim 21 is allowable and indication of such allowance is earnestly requested.

It is noted that claim 21 is amended by this Amendment to correct minor grammatical errors, and not to overcome the cited art or for reasons of patentability.

Claim 22:

Claim 22 is dependent on and further limits claim 21. Since claim 21 is believed allowable, claim 22 is also believed allowable for at least the same reasons as claim 21.

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CONCLUSION

In view of the forgoing remarks, it is respectfully submitted that this case is now in condition for allowance and such action is respectfully requested. If any points remain at issue that the Examiner feels could best be resolved by a telephone interview, the Examiner is urged to contact the attorney below.

No fee is believed due with this Amendment, however, should such a fee be required please charge Deposit Account 50-0510. Should any extensions of time be required, please consider this a petition thereof and charge Deposit Account 50-0510 the required fee.

Respectfully submitted,

Dated: February 21, 2005

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